

P.1
Crystal Latta
P.O. Box 1104
Haleiwa, HI 96712

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Crystal Latta

Crystal Latta

Kimberly Hardy
226 Millpond Village
Hamden, CT 06514

11/30/90

EPA Administrator William K. Reilly
Washington, DC 20460

Dear Mr. Reilly:

Please reject Ethyl's application to use MMT. It is my understanding that manganese at high doses has proven to be a human neurotoxin. Although we may not thoroughly understand this chemical's advantages and/or disadvantages, we do know its manufacturer(s) for their blatant disregard for public and environmental health.

As protectors of the environment, I believe our focus should be on energy-efficiency and alternative energy sources to fuel, rather than the production of more chemicals to combat our already chemical-ridden planet.

Thank you,
Kimberly Hardy
Kimberly Hardy

Pliny Porter
3759 Griffith View Dr.
Los Angeles, CA 90039

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

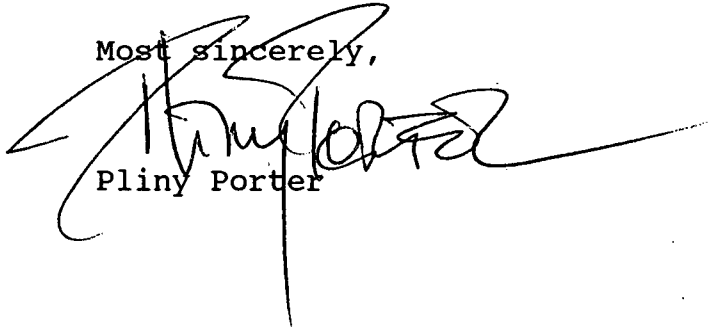
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Most sincerely,



Pliny Porter

P.4
Monica Hayes Anderson
67 W. 89th St.
New York, NY 10024

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

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Most sincerely,



Monica Hayes Anderson

Jai Hari Singh Khalsa
Jai Hari Kaur Khalsa
65914 White Rock Loop
Bend, OR 97701

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Jai Hari Singh Khalsa



Jai Hari Kaur Khalsa



We're 'In Things' for Kids

MS. JILL GOLDMAN
1500 N. LA SALLE ST
CHICAGO, IL 60610 380

Dear Mr. Reilly:

I strongly urge you to reject Ethyl's application to use MMT. We have had many years experiencing the health problems that the lead in our gasoline has caused. To add manganese would lead to another public health catastrophe. We cannot afford to repeat old mistakes. I would like you to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the U.S.

We all need your support in cleaning up our air, food and water.

Most sincerely,

Jill Goldman
Earth Day 90 Chicago
Personnel Director

NET

51136

Mr. William K. Reilly
EPA Administrator
Washington DC 20460

11/14/90

I am writing to urge you to reject the Ethyl Corp.'s application to use MMT (Manganese) as a gasoline additive. Manganese is a demonstrated human neurotoxin, with irreversible pathological effects on the human brain. This country experienced a public health catastrophe thru using lead in gasoline. We cannot allow a similar tragedy thru the use of MMT.

Sincerely yours,

M. Virginia Riday

Dear Sir,

Please do not allow the
use of manganese as a gasoline
additive in any area/region
under your control. Protect our
air.

Ferry Evans Tucker

P O Box 11113

Merr. Tn 36411

Mr. Kelly -

Please do all in your power
to REJECT Ethyl's application
to use MMT in gasoline.

The airborne effluents are
potentially dangerous; and
the demand for manganese would
increase pressure for such
potentially disastrous mining operations
as off-shore extraction.

Sincerely,

Colin Retina
COLIN RETINA

12/22/70

Dear Mr. Reilly,

I have just read about the proposed use of a gasoline additive containing manganese. If this is still under consideration I urgently advise against its approval by your agency. As a student of clinical psychology and practicing psychotherapist, I am alarmed at the possibility of widespread manganese poisoning (as with lead, small amounts from many gallons of gas will eventually build up to a toxic level), particularly on the brain and mental state. The Romans didn't know what they were doing to themselves. We do.

Sincerely,
Janet E. Robinson EdM

Jan 8, 1991

Mr. Reilly:

Please reject last year's application
the Ethyl Corporation to use the
oline additive MMT, a manganese
ipound, if you have not already
re so. As our population of both
ple and cars grows the amount of
e auto emissions ingested obviously
o grows - to levels please consider
igerous.

Sincerely,

Lynn Olson

January 7, 1991

William K. Reilly
Administrator
Washington, DC 20460

Mr. Reilly:

I am writing to express my
concern over the possible effects
MMT as an additive in gasoline
on living scientists (and the public)
or that MMT could have
environmental and public health
consequences as similar to those of
lead.

I am urging you to reject
Ethyl Corporation's application
to use MMT in gasoline. The
pollution caused by leaded gasoline
is certainly not a mistake the US
wants to repeat.

Sincerely,
V. I. ...

77 Myrtle Blvd
Larchmont, NY 1
Dec. 29, 1990

William Reilly
OA Administrator
Washington, DC

Sir -

I strongly urge you to reject the Ethyl Corporation's application to use MMT as a gasoline additive. The disastrous use of lead for 50 years should have taught us something. It does no good to reduce auto exhaust pollutants by using a different pollutant.

The Ethyl Corporation is seeking to serve their own interests and not that of the public — do not approve their request.

Yours truly,
Percy L. Lerner

Honorable William Reilly
Environmental Protection
Administrator / Secretary.

Jan 10 '91

Dear Sir:

I was glad to read in the San
Jose Chronicle, Jan. 10 '91 that you
claimed yesterday that environmental
issues remains a high priority for the Bush
Administration - News to me, I can tell you -

The environment is among the most
important issues before the public (the
may come & go - but the environment remains
an important factor. ; it should get top billing.

Bush himself -- The people are concerned
with their food safety & just as foremost
concerns are on the climate.
We are all aware of the shadow hanging
over the Planet - the Greenhouse Effect. Wars
come, unfortunately, but hopefully we may
lose sight of the profound effect which
air & weather have upon the
life of the Planet.

We get more pollution from our gasoline
than everything else - & now, right now
should be attending to this. (Europe is
ahead of us in mileage - 42 mpg but
in the US (& probably abroad) the hydrogen
is the solution to car pollution. The cars
need not be retrofitted & cars can
be adjusted to Hydrogen & like fuels.
I wonder if Bush thinks of this at all, being
man.

For you Mr. Reilly have a heavy load on your
shoulders of real responsibility for our atmosphere.

We, the people want to hear this from you.
Sincerely - Isakael Reed

Jan. 9, 1991
Carole H. Spicer
3723 Buick's distillery Rd.
Sparksville MD 21154

William K. Reilly
EPA Administrator
Washington, D. C. 20460

Dear Sir:

I must join my voice with Dr. Ellen K. Silbergeld in urging the EPA to reject the Ethyl Corporation's application to use MMT (methylcyclopentadienyl manganese tricarbonyl) as an additive in gasoline.

Carnestly
Carole H. Spicer

Ron I. Wish, M.D.
112 Highmount Avenue
Upper Nyack, New York 10960
914-358-4815

1/11/91

N.Y. License #168983

Dear Mr. Reilly,

I urge you to reject the Ethyl Corporation's application to use MMT as an octane-enhancing gasoline additive. The public health disaster which will ensue will likely be comparable to the widespread lead poisoning now present in the USA.

Sincerely,

Ron I. Wish M.D.

December 26, 1990

Steven D. Sabowitz

509 E. 77th St. #1F

New York, N.Y. 10021

EPA Administrator William K. Reilly
Washington, D.C. 20460

Dear Administrator Reilly,

Please note my opposition to Ethyl Corporation
application to use methycyclopentadienyl manganese
tricarbonyl (MMT) as a gasoline additive.

Sincerely,

Steven D. Sabowitz

DEC 28 1990

Janet Luke Weaver
605 East Dufort
Sagle, ID 83860

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in cursive script that reads "Janet Luke Weaver". The signature is written in dark ink and is positioned above the printed name.

Janet Luke Weaver

647 Royal Abbey Drive
Stone Mountain, GA 30088
January 4, 1991

Mr. William K. Reilly
EPA Administrator
EPA
Washington, D.C. 20460

Dear Mr. Reilly:

I am writing to you to urge you not to allow the Ethyl Corporation to add methycyclopentadienyl manganese tricarbonyl (MMT) to gasoline. The addition of lead to gasoline was a terrible mistake and has caused terrible damage to the health of man and the environment, and we cannot afford to allow manganese to be added to also endanger our health.

There is not enough data on manganese to make a decision to allow its use in gasoline. No one thought lead was harmful when it was introduced to gasoline, and now we are paying the price with lead poisoning.

Please, do not allow the use of MMT in gasoline. The supposed benefits are minimal and do not warrant the use of something that will most likely prove to be extremely toxic. We have already destroyed our health and our environment enough, and I sincerely urge you to say "NO" to this attempt by the Ethyl Corporation to harm the public with MMT.

Sincerely,

Carol W. Fogle
Carol W. Fogle

January 3, 1991

William K Reilly
EPA Administrator
Washington, DC 20460

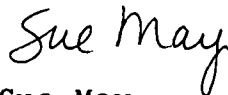
Dear Mr. Reilly,

I am writing to express my concern about the application that the Ethyl Corporation currently has into the EPA requesting the use of manganese tricarbonyl (MMT) as a gasoline additive.

Let's not allow the lack of data available about the toxic effects of MMT to become the argument to use the additive. We cannot risk leaving another epidemic like gasoline induced lead poisoning for future generations.

I would like to urge the EPA to reject this new application and immediately suspend all currently permitted use of MMT as a gasoline additive in the United States.

Respectfully,



Sue May
Rt 2 Box 195A
Maiden, NC 28650

Office of the Executive Director
Environmental Defense Fund



257 Park Avenue South
New York, NY 10010

*** 4001 02097 1 ZP 0.205 BFED285A ***

Ms. Jean M. Benson
Box 302 Old New Ipswich Rd
RINDGE NH 03461-0302

RR02 Box 2478

025
What did you do FOED
about this Mr. Kelly?
Please respond

October 16, 1990

Dear Ms. Benson:

I've had just about enough of the Ethyl Corporation. And once I tell you about the scheme that they're trying to put over on the U.S. population, I think you'll agree.

- The Ethyl Corporation of America is asking the EPA to approve a gasoline additive it calls "HiTec 3000."
- Ethyl Corp. has launched a full-blown ad campaign that misrepresents this new additive as both safe and environmentally beneficial.
- In reality, "HiTec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses.
- Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal.

And it won't be the first time!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a major contributing cause of chronic lead poisoning affecting millions of children around the world.

New research reveals a virtual lead poisoning epidemic among our nation's children, both urban and rural, rich and poor. Much of that lead -- ingested from dust and dirt in yards and playgrounds -- came out of the tailpipes of cars that burned leaded gas over the past 65 years. Cleaning up this contamination will be both slow and expensive.

Now, for the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

Luckily, you and I have until November 6th to stop them.

(over, please)

Ethyl has until November 6th to convince EPA to approve HiTec 3000. And it has been running full page ads in major newspapers in a shameless effort to lure the public and the Administration into believing that its new additive is safe.

This is one of those rare chances we have to nip an environmental disaster in the bud. Here are the 3 steps I ask you to take immediately:

1. Add your name to our "Open Letter to the EPA" to appear in a major newspaper advertisement from EDF (see the enclosed draft) to help us tell the real story on Ethyl Corporation to newspaper readers.
2. Double the power of your protest by writing a short personal note to Administrator William K. Reilly, Environmental Protection Agency (401 M Street, SW, Washington, DC 20460).
3. Send your generous gift to support the newspaper ad and to help EDF continue this critical campaign.

You know that EDF can get results. Our persistent campaign against leaded gasoline helped win its large scale phasedown during the 1970's. But this was a battle we might never have had to fight, had Ethyl Corporation acted responsibly from the start.

You see, the hazardous potential of the original lead gasoline additive was never a secret to Ethyl. Back in 1925, 40 workers at Ethyl's first plant were stricken with lead poisoning and five of them died from it. But Ethyl Corp. ignored the obvious warning sign -- that these cases of acute poisoning foreshadowed a possibly tremendous chronic problem . . . once millions of tons of lead-laden car exhaust were pumped into the environment.

We simply can't let Ethyl Corp. put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether preventable today. And with your help, and the 3-step plan I've sketched above, we won't have to!

Ethyl Corporation managed to fool the public once . . . and the resulting damage to the environment and public health, much of it irreparable, is done. All we can say now is "Shame on them."

But if we let them do it again, shame on us!

Yours truly,



Fred Krupp
Executive Director

P.S. Please sign and return immediately the Authorization to add your name to our Open Letter. I must receive it no later than October 29th to meet our newspaper deadline. And thanks in advance for your help!

FROM EILEEN
LURIE

MEMO

1/23/91

Dear Mr. Reilly,

I am writing to
urge you to
reject Ethyl's application
to use MMT as a
gas additive. Manganese
will no doubt add
more dangerous pollutants
to our environment.

Sincerely,
Eileen Lurie
5 Riggs Place
W. Orange, NJ 07052

January 18, 1991

William K. Reilly
Administrator
Washington, D.C. 20460

Mr. Reilly:

I urge you to reject the
Exxon Corporation's application to
use MMT as a gasoline additive.

We surely don't need to
add to the current toxins in our
environment & I would hope
we can pursue non-polluting
options - (i.e. Solar) to solve the
missions problems we, as a
elective people of this earth,
are to face.

Respectfully yours,
Doris L. Horan

Jan. 21

William K. Reilly,

I am writing, as an
informed and concerned
citizen, to urge you
reject Ethyl's application
use MMT (as proposed
performance-enhancing gasoline
additive) in any way.

Sincerely,

Andy Stacking

144 N. 102

Seattle, WA 98133

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name:

Susan Selo

Address:

*2200 Brittainy Oaks Trail
Warren, Ohio 44484*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

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Sincerely a concerned voter,

Name:

Lamara Leigh Murphy

Address:

*15A Holly Drive Grand, OH
#54 44420*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses: Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Sincerely a concerned voter,

Name: *Areta Damstoft*

Address: *194 Yak Ave Warren, OH 44485*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

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Sincerely a concerned voter,

Name:

Molly J. Hartman

Address:

*1081 ROSALIE AVE
LAKEWOOD, OH 44107.*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Sincerely a concerned voter,

Name: *L. J. O'Connell*

Address: *194 YORK Ave. NW. WARREN OH,
44485*

Administrator William K. Reilly
Environmental Protection Agency
401 M. Street, SW
Washington DC 20460

Dear Administrator Reilly,

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Sincerely a concerned voter,

Name: Joseph D. Dieckel
Address: 1660 Sodom-Huttings rd.
Vienna, Ohio 44473

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Sincerely a concerned voter,

Name: *Jen Baithon*

Address: *1555 Edgewood
Warren Ohio 44483*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: *Ronald R. Gilbert*

Address: *4160 N. Park EXT. Cortland, Ohio 44410*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Sincerely a concerned voter,

Name:

Doreen Marie Gilbert

Address:

4160 N. Park Ext Cortland OH 44411

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

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Sincerely a concerned voter,

Name: *Velia J. Baber*

Address: *409 Fairmount N.E.
Warren Oh.
44483*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

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Sincerely a concerned voter,

Name: *Jerry M. Placer Jr.*

Address: *686 BANK ST
WARREN OHIO
44483*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

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Sincerely a concerned voter,

Name: *Juliane L. Broz*

Address: *586 BARK ST N.E.
warren OH 44483*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

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Sincerely a concerned voter,

Name: *Rick Beckham*

Address: *2374 Alabama S.W.
Dalton, Ohio 44618*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

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Sincerely a concerned voter,

Name:

Corley D. Kohl

Address:

*821 Amherst Rd. N.E.
Massillon, Ohio
44646*

1/30/91

Dear Mr. Reilly:

I recently learned of the Ethyl Corporation's application to produce and sell its newest gasoline additive, MMT. Thanks in part to Ethyl ~~our~~ environment has been saturated with huge doses of tetraethyl lead for almost three-quarters of a century. And now the EPA is considering allowing a gasoline additive with manganese (a neurotoxin) to be put on the market. Ethyl claims that the manganese releases into the environment will be insignificant. But we all know that with so many millions of cars in the U.S., even an exhaust product expelled in trace amounts will eventually accumulate to hazardous concentrations. I urge you to reject Ethyl's application to use MMT and send a message to the industrial corporations ~~that~~ put more value on the dollar bill than the natural environment we all share.

Sincerely,

Jay Gump

January 11, 1991

Dear Mr. Reilly,

The following members of the Oconee Environmental Coalition, would like for you to reject the Ethyl Corporation's request for the approval of the widespread use of methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive. Since there is no data on the potential cumulative health effects of massive inputs of manganese into the environment, we think that it would be a mistake to grant permission for its use as an additive. Our society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline. According to Merritt's Textbook of Neurology, "prolonged exposure to manganeseleads to behavioral changes and later, to parkinsonism."

We urge you to say no to their request and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

Thank you,

Candace McKeeney
 Mary Jane Phillips
 Sue Speier
 Jeff Goh
 [Signature]
 Rita N. Winters
 Richard Harned
 Vallette Jordan
 Lorraine Harned

Cheryl McDaniel
 Mable Fort-Homa
 R. Daryl HERNAN
 Philip Fumblin
 [Signature]
 Debbie Thompson
 Dorothy Butler
 Mary Ann May
 [Signature]

Siri Pritam Kaur Khalsa
1215 El Margarita Rd.
Yuba City, CA 95991

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Siri Pritam Kaur Khalsa

S PK Khalsa

ENVIRONMENTAL DEFENSE FUND

257 Park Avenue South
New York, NY 10010
(212) 505-2100

January 20, 1991

Fred Krupp
Executive Director

Mr. John Van N. Dorr II
4982 Sentinel Drive #304
Sumner Village
Bethesda, Maryland 20016

Dear Mr. Dorr:

Thank you for your recent letter. I appreciate your taking time to write to express your concern about EDF's protest of the addition to manganese in gasoline.

As you point out, the problems arising from lead in gasoline were greatly exacerbated by growth in traffic. However, those high-density traffic patterns are likely to continue for at least the medium term. Thus, widespread addition of manganese to gasoline are likely to produce -- as with lead -- cumulative environmental loadings of a persistent, non-degradable heavy metal. Indeed, the clearest message to be learned from lead-gas additives is that using such materials in an inherently dispersive fashion creates a problem that is nearly impossible to correct, at least absent vast expenditures of money.

The point of Dr. Silbergeld's essay is precisely that the low-dose, long-term effects of manganese are not well understood, and that running an uncontrolled experiment on the general U.S. population is neither a morally acceptable nor scientifically sound way to gather such data. Although you indicate that you have not observed health problems in manganese workers, health effects of high-dose manganese exposure are in fact extensively documented in the toxicological literature. In addition, these views on manganese's high-dose toxicity and lack of knowledge on its low-dose effects are echoed by the detailed comments on Ethyl's application submitted by the National Institute of Environmental Health Sciences.

We strongly believe that our position on manganese additives is not only scientifically supported, but indeed the only responsible position in light of (i) manganese's known high-dose toxicity, (ii) the lack of knowledge of its low-dose effects, and (iii) prior experience on heavy-metal additives in gasoline.

1616 P Street, NW
Washington, DC 20036
(202) 387-3500

1405 Arapahoe Avenue
Boulder, CO 80302
(303) 440-4901

5655 College Avenue
Oakland, CA 94618
(415) 658-8008


1108 East Main Street
Richmond, VA 23219
(804) 780-1297

128 East Hargett Street
Raleigh, NC 27601
(919) 821-7793

1800 Guadalupe
Austin, TX 78701
(512) 478-5161

I understand, and share, your opinion that the environment can benefit from cooperation with business and industry. It is, in fact, an important part of EDF's strategy for problem-solving. One case in point is EDF's joint task force with the McDonald's Corporation. (See enclosed article). Please take time to read the enclosed book, Ahead of the Curve which details EDF's use of market incentives and cooperative efforts.

Yours truly,



FDK/dkw

cc: Bill Reilly, EPA

Jay Hair, National Wildlife Federation
Sue Merrow, Sierra Club
John Sawhill, The Nature Conservancy
Peter Berle, National Audubon Society
John Adams, NRDC
George Frampton, Wilderness Society
Anthony White, Audobon Naturalist Society
Peter Bahouth, Greenpeace USA

JOHN VAN N. DORR II
4982 SENTINEL DRIVE, APT. 304
SUMNER VILLAGE
BETHESDA, MARYLAND 20816
December 14, 1990

Mr. Fred Krupp, Executive Director
Environmental Defense Fund
257 Park Avenue South
New York City, New York 10010

Dear Mr. Krupp:

I have received the Environmental Defense Fund Letter of October 1990, Vol XXII, #4, which, on page 7, contains a diatribe by Ms. Silbergeld against the Ethyl Corporation and its advocacy of a manganese additive to increase the efficiency of gasoline motor fuel. No credible or even incredible scientific or statistical evidence was advanced -- the article as published is based on the fact that the Ethyl Corp. introduced lead as an additive to gasoline many years ago and that lead poisoned the atmosphere until its removal by EPA some years ago. Ergo - the manganese addition must be bad too!

At the time lead was added to gasoline, I was not (nor do I think many other persons were) aware of the dangers of atmospheric lead. Indeed, considering the low numbers of cars in those days, the danger probably was not great. Only the proliferation of people, cars, and urban crowding exacerbated the danger. Now we are removing old paint from buildings, old plumbing, old water fountains because we are aware of dangers, but I see no articles excoriating paint or plumbing companies.

Of course manganese in high concentrations is toxic. So are most other elements. So is salt. However, we know (if nutrition experts are to be trusted) that we need certain quantities of the so-called "toxic" elements to support our life systems, as do other animals and plants. That is why certain of these elements are routinely added to fertilizers.

In 35 years of close contact with manganese as a specialist on manganese for the U.S. Geological Survey, having visited hundreds of manganese deposits and mines extracting manganese minerals of widely varying composition on five continents, I have never encountered health problems attributed to manganese in workers in the industry. This does not mean that manganese in certain forms cannot be toxic; rather it means that allegations as to toxicity need to be backed up by carefully documented facts.

It is very important for environmental organiza-

tions to avoid ill-informed and exaggerated attacks on industries. Many industries are advancing the state of the science and art of avoiding damage to the environment. Some are not. Environmental organizations should encourage and assist those companies that are making honest effort and chastize those which are not. Many commodities needed by our complex civilization cannot be produced without some danger to the environment. Should we return to caves? Could we?

Environmentalists characteristically underestimate the force of the mating instinct and the adaptability of animals to changing environments. Last August I had the pleasure of seeing hundreds of sea otters, seals, sea lions, eagles, various sea birds, on Prince William Sound. One would never learn of this recovery from the many environmental organizations to which I contribute. In the Prudhoe Bay oil fields I saw the complete compatibility of local wildlife and intelligent industrial development, but all I get from the environmental organizations to which I belong are outraged cries about possible development of ANWAR.

Environmental organizations should ask themselves whether the often shrill and misleading attacks on industries that are doing their best to provide needed commodities with minimal environmental cost are not responsible for our defeats last election day. The public is getting fed up and cynical, as well it might. Our past victories and the ones we still have to win, such as the elimination or at least strict control of clear-cutting, must be based on the education of the public in a responsible manner. The public is not stupid. We must supply objective, accurate information if we hope to receive continued support from the public.

Yours truly,

John Van N. Dorr II
John Van N. Dorr II

CC: Mr. William Reilly, EPA Administrator
Mr. Jay Hair, President, National Wildlife Federation
Ms. Sue Merrow, President, Sierra Club
Mr. John Sawhill, President, Nature Conservancy
Mr. Peter A. Berle, President, National Audubon Society
Mr. Robert Heist, President, Natural Resources Defense Council
Mr. George Frampton, President, Wilderness Society
Mr. Anthony White, President, Audubon Naturalist Society
Mr. Peter Bahouth, President, Greenpeace

MR. FRANCIS W. MILLER
2496 CENTRAL AVENUE
BALDWIN, N.Y., 11510-3606
FEBRUARY 28, 1991

WILLIAM K. REILLY
ENVIRONMENTAL PROTECTION AGENCY
401 M STREET S.W.
WASHINGTON, D.C., 20460

Dear Sir:

I am in receipt of a letter from
Ethyl Corporation
330 South 4th Street
Box 2189
Richmond, Virginia 23217

Their extensive tests of their Hi Tec[®] 3000
fuel additive show tail pipe emissions
including nitrogen oxides can be reduced
significantly.

Refiners could reduce reliance on toxic
aromatics used to boost octane ratings.

Many barrels of crude oil saved daily
Cost to consumer reduced if anything
Canada has been using since 1978

Please cut all the bureaucratic red
tape and IMPLEMENT the use of this real
environmental help immediately. This
is not some of the guess work and harming
of hard working people at endless expense
that has been done.

Thank you

Francis Miller

P.S. Ann Landers had an interesting bit
about the more costly use of millions of
tons of disposable Diapers, VS. old fashioned,
which take 500 years to decompose while
filling up landfills

81 MAY 2 63:12

CONFIDENTIAL
RECEIVED

RECEIVED
MAR 5 1970
FBI - NEW YORK
100-100000

TO DIRECTOR, FBI
FROM SAC, NEW YORK
SUBJECT: [illegible]
RE: [illegible]

[The following text is extremely faint and largely illegible, appearing to be a multi-paragraph memorandum or letter.]

[The following text is also faint and illegible, possibly a signature block or a concluding paragraph.]

91MAR 5 P 3:15

4250
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EPA
CORR. CONTROL

Dear Mr. Reilly, I support his outside's views. Please read it.

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

Sincerely, *Alexander Gavril*

Alexander Gavril

EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—*The Wall Street Journal*

"...may break ground in the fight to protect the environment."

—*The Boston Globe*

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—*Star Tribune, Minneapolis-St. Paul*

ENVIRONMENTAL DEFENSE FUND
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Watch for "EARTH TO KIDS:
A Guide to Products for a
Healthy Planet," this
December on HBO. Produced
by Consumer Reports Television
in association with EDF.

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ITHACA NY 14850

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EDF Letter

8590 Renown Drive
San Diego, CA 92119

March 19, 1991

Mr. William K. Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

I have just read an article in a newsletter put out by Fanlight Productions about the new manganese-based gasoline additive, which is being promoted for use by the Ethyl Corporation. It states that high doses of manganese are known to cause persistent and irreversible brain damage and may more severely affect fetuses, the young and the aged. The warning from toxicologist Ellen K. Silbergeld of the Environmental Defense Fund states that we know little about long-term, low-dosage effects of manganese, and to allow its use without further study would amount to "a massive human experiment".

I urge you to reject Ethyl's application for authorization to introduce the new additive to gasoline. There are simply too many toxic substances in our human environment to worry about right now and we could do well to eliminate any concerns about new ones before they exist. Thanks for considering my appeal.

Sincerely yours,



Beda Johnson
Concerned citizen

54-41-10

RECEIVED
EPA
CORR. CONTROL
6057
91 MAR 25 P 4:08

Nancy K. Herzberg
Mills Road
Cape Porpoise, ME 04014

March 15, 1991

William K. Reilly
EPA
Washington, D.C. 20460

Dear Mr. Reilly:

I urge you to reject Ethyl Corporation's application to use MMT as a new gasoline additive. I urge the EPA to suspend all currently permitted use of manganese as a gasoline additive in the United States. The widespread use of manganese would invite the repetition of the public health catastrophe associated with the use of lead as a gasoline additive.

Thank you for considering my views.

Sincerely,

Nancy K. Herzberg
Nancy K. Herzberg

3:20

RECEIVED
EPA
CORR. CONTROL
5874
91 MAR 21 P 3:50

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

March 7, 1991

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: *Ronald B. Dull*
Ronald B. Dull

Address: *205 Churchill-Hubbard Rd., Apt. 10*
Youngstown, O. 44505-1362

Phone: *216-759-7111*

RECEIVED
EPA
CORR. CONTROL
4930
91 MAR 12 P 3:10

1/30/91

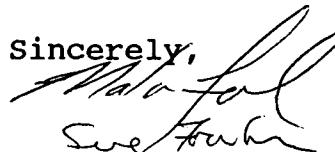
Environmental Protection Agency
William Reilly, Administrator
401 M Street, SW,
Washington, D.C. 20460

Sir,

This letter is in reference to Ethyl Corporation and their product "HiTec 3000". The information that I read about the petroleum additive appeared to show the product is very effective and needs your approval. Protecting and cleaning the environment is important, any product that promotes this far out weights minimal side effects or special interest groups! I hope that the conclusions from your testing backs what I have read and will lend to your approval.

Thank you for your time.

Sincerely,



4004 Cork
La Porte, CO 80535

Mark and Susan Fowler

RECEIVED

EPA

CORR. CONTROL

2563

91FEB12 A9:56

Dr. Santokh Singh Khalsa
Suraj Kaur Khalsa
853 New York Dr.
Altadena, CA 91107

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,


Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,


Dr. Santokh Singh Khalsa


Suraj Kaur Khalsa

Siri Ram Singh Khalsa
1800 S. Roberston Blvd. #182
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460


Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Most sincerely,


Siri Ram Singh Khalsa

Walfredo Reyes
Carolina Reyes
P.O. Box J26
Manhattan Beach, CA 90266

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Most sincerely


Walfredo Reyes


Carolina Reyes

Martha B. Eaton
2341 Edgewater Way
Santa Barbara, CA 93109

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Martha B. Eaton, Ph.D.

Martha B. Eaton

Jacqueline Howard
547 N. Spaulding Ave. #209
Los Angeles, CA 90036

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,


Jacqueline Howard

6-11-77

November 5, 1990

William Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

I am writing to urge you to deny Ethyl Corporation's application to use methycyclopentadienyl manganese tricarbonyl (MMT). Let us not risk exposure to manganese for little or no reduction in tailpipe emissions.

I have two young children, ages 3 and 8 months. I know how harmful the effects of lead are to developing nervous systems. Don't allow a repeat of Ethyl's "achievements" with lead.

We have a long way to go to protect our environment and our health. ~~Some~~ Rejecting Ethyl's application is a step in the right direction.

Sincerely,
Sarah Jenkins
601 Park Blvd.,
Austin, Texas 78751

NOV 10 1990

William K. Reilly
EPA
Washington, DC 20460

11/1/90

Dear Mr. Reilly,

I am concerned that your department might be allowing the use of manganese as an additive to gasoline.

After the disastrous effects of adding additives in the past, to increase octane, this is unconscionable.

Please do not even consider such a thing. We need to reduce the chemical emissions in our precious air. Please get with the future, not the past.

Sincerely,

Patricia A Bunch (Burch)
3971 Haines St - #B
San Diego CA 92109

Lawrence E. Mich
505 Belmont Ave.
Los Angeles, CA 90026

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

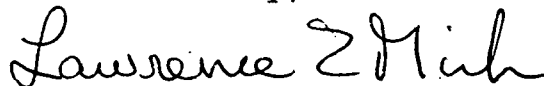
Dear Mr. Reilly,

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Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in cursive script that reads "Lawrence E. Mich". The signature is written in dark ink and is positioned above the typed name.

Lawrence E. Mich

Julie Comins
2131 N.Gower St.
Los Angeles, CA 90068

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

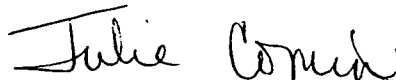
Dear Mr. Reilly,

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Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Julie Comins

William K. Reilly
Administrator
U.S. Environmental Protection Agency
Washington D.C.

10/29/90

Dear Sir,

I am an active member of Environmental Defense Fund .

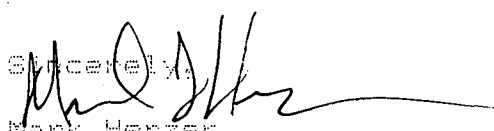
I want Ethyl Corporation's application for HiTec 3000
DENIED!

If we want to protect the environment we should be pushing
toward more use of solar in our heating and in generating
electricity.

Reduce use of gasoline by increasing car mileage standards.

New ideas we need. More dangerous additives we don't need.

Sincerely,



Mark Henzer
764 N. Hoover
LA CA. 90029

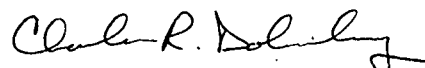
Charles R. Dobrovolny
1952 N. Hudson Avenue
Chicago, Ill. 60614
November 5, 1990

William K. Reilly
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Sir:

I am writing to you to urge you to reject Ethyl Corporation's application that methycyclopentadienyl manganese tricarbonyl (MMT) be approved as an octane-enhancing gasoline additive, and to suspend all currently permitted use of manganese as a gasoline additive in the United States.

Sincerely,


Charles R. Dobrovolny

107:23

Barrie Rubenstein
4326-C Via Marina
Marina del Rey, CA 90292

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in dark ink, appearing to read 'Barrie Rubenstein', with a stylized, sweeping flourish at the end.

Barrie Rubenstein

Patricia A. Kinnaman
5909 Calvin Ave.
Tarzana, CA 91356

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460


Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in cursive script, reading "Patricia A. Kinnaman".

Patricia A. Kinnaman

ETHYL CORPORATION

330 SOUTH FOURTH STREET

POST OFFICE BOX 2189

RICHMOND, VIRGINIA 23217

October 26, 1990

over

Laura Field
3721 East Janice Way
Phoenix, AZ 85032

Dear Ms. Field:

Thank you for your recent inquiry requesting additional information on HiTEC[®] 3000 performance additive, a fuel additive that will help reduce significantly harmful automobile emissions in the air.

We at Ethyl Corporation are pleased that we can make a contribution toward reducing air pollution. On May 9, 1990, we asked the Environmental Protection Agency (EPA) to approve our product for use in gasoline.

For the last two years, Ethyl Corporation has been conducting the most extensive series of driving tests ever performed on a gasoline additive. The test program involved a 48-car fleet driving more than 3 million miles.

The results show that HiTEC 3000 additive, a manganese-based octane improver, can reduce significantly overall tailpipe emissions, including nitrogen oxides, one of the most harmful pollutants and a major component of urban smog. The additive allows refiners to reduce their reliance on toxic aromatics such as benzene, to boost the octane rating of gasoline and to extend fuel efficiency. Use of the additive would save about 82,000 barrels of imported crude oil a day, or 30 million barrels a year. Since 1978, Canadians have driven more than 400 billion miles on gasoline containing HiTEC 3000 additive with no harmful effects to the environment.

Enclosed is a brochure with more detailed information on HiTEC 3000 performance additive. After reading the brochure, if you would like to express support for the fuel additive, please write to EPA Administrator William K. Reilly at the Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460.

The EPA has until early November to reach a decision. Again, thank you for your interest.

Sincerely,

Deborah Shepperson
Deborah Shepperson

11-2-90

I, AND MY MANY FRIENDS &
LARGE FAMILY, URGE YOU TO SEE TO IT
THAT THE PUBLIC BE ASSURED OF
BEING ABLE TO HAVE "HITEC 3000"
ON THE MARKET AS SOON AS
POSSIBLE.

If you do not agree that
this would be as beneficial as
ETHEL CORP. SAYS, THEN, PLEASE, MAY I
HEAR FROM YOU BY RETURN MAIL, AS TO
FOUR REASONS WHY THIS WOULD BE SO.
THANK YOU!

Sincerely
Lance Field

RECEIVED
EPA
CORR. CONTROL
NOV 5 3:47 PM '90

Hope Mauran Walsh
665 Milton Road
Rye, New York 10580

October 31, 1990

Dear Mr. Keilly:

Please reject the proposal to use MMT in gasoline. The effects of widespread levels of manganese in the environment are unknown, it's not worth the risk. I am sure you spend much of your time trying to make right the environmental errors of the past, please don't make a decision in haste that could cause future generations yet

RECEIVED

EPA

CORR. CONTROL

39194

90NOV 5 P3:53

Hope Water

Sincerely,

Additional Problems.

October 28, 1990

Dear Mr. Reilly,

Please find time to read the enclosed

Please reject Ethyl's application to add MMT
to gasoline. I feel it could have adverse
effects on the health of many people.

Thank you,
Hermin B. Hurlbert

64:10

RECEIVED
EPA
CORR. CONTROL
39574
90NOV 7 P/4:10

Att. William K. Reilly:

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But both what we know and what we do not know about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do not know what the long-term chronic, low-dose effects of human exposure to manganese are. We do not know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do not know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



T. Charles Erickson

Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—The Wall Street Journal

"...may break ground in the fight to protect the environment."

—The Boston Globe

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—Star Tribune, Minneapolis-St. Paul

ENVIRONMENTAL DEFENSE FUND

Since 1967 — The Power of Positive Solutions
257 Park Avenue South, New York, NY 10010

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Address Correction Requested

Watch for "EARTH TO KIDS:
A Guide to Products for a
Healthy Planet," this
December on HBO. Produced
by Consumer Reports Television
in association with EDF.

PEEL OFF FOR ORDER FORM INSIDE
05253086 AWL007
DEE VA HURLBUT
1737 NE NAOMI PLACE
SEATTLE WA 98115

NON-PROFIT ORG.
U.S. POSTAGE
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ENVIRONMENTAL
DEFENSE FUND

EDF Letter

November 3, 1990

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Mr. Reilly:

I am a member of the EDF (Environmental Defense Fund). I received a letter from the EDF stating that the Ethyl Corporation is asking you to approve a gasoline additive called "HiTec 3000". I was told that "HiTec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses.

Admin William K. Reilly
Nov. 3, 1990
Page 2

Since the Ethyl Corporation has been the chief Supplier of lead gasoline additives now known to have been a major contributing cause of chronic lead poisoning affecting millions of children around the world, I hope you make the right decision for your child's sake as well as everyone else's.

If "Hi-Tec 3000" is ~~a~~ environmentally dangerous - please do not approve this gasoline additive.

Thank-you for listening to my point of view.

Robert Diggins
Wilmington, Delaware

10/31/90

Dear Mr. ^{REILLY} Kelly

As a concerned citizen I'm interested in stopping over use of our natural resources as much as possible.

I have just received a brochure from Ethyl about their additive H.Tec 3000. It is a very glowing report to say the least.

What I would really like to know is how are your test progressing & what have you found out.

Have you checked with the Canadian Govt. & this study by Turner, Mason & Co.

The Company (Ethyl) Believes that Hydrocarbons will show NO Increase. What do you think? - What about Toxic Symptoms of Manganese Exposure?

& Finally What Will The Ultimate
Cost be.

Respectfully yours,

William D. DUFFY

37 LAUREL RD

SLOATSBURG, N.Y.

10974

P.S.

Any Information You could Provide
Would be Appreciated

Nov. 1, 1990

Mr. William K. Reilly
EPA Administrator
Washington, DC. 20460.

Dear Sir -

Though I do not have adequate
stationary bed in the hospital,
I do hope you will consider the
information on the enclosed
sheet from the "Env. Defense Fund"
on the application described
therein. We all knew what
the effect of Ethel is on the human
population alone, after it was
added to the gasoline. The
account on the Environmental
Defense Fund's sheet - describes
it far better than I can now
now in the hospital and can't
write an adequate letter I hope

-2-

You will consider what
it says and the possible
results of the effect of
manganese tricarbonyl (MMT)
on the U.S.

Very truly,
Rachel A. Weckert

Bebe Rea

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

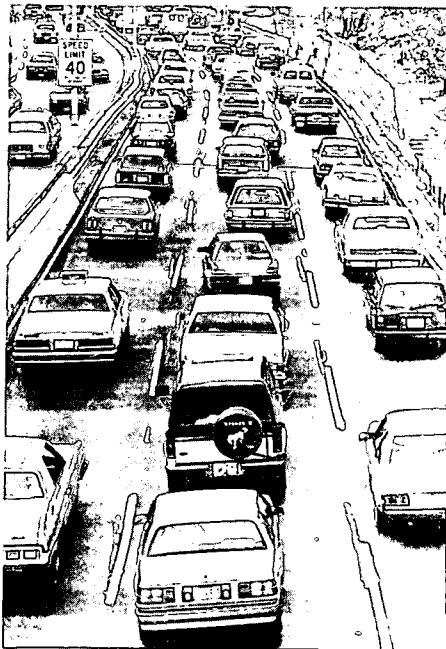
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



T. Charles Erickson

Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—*The Wall Street Journal*

"...may break ground in the fight to protect the environment."

—*The Boston Globe*

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—*Star Tribune, Minneapolis-St. Paul*

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December on HBO. Produced
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in association with EDF.

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EDF Letter

A-90-16

222 Miramar
Upland, CA 91786
October 20, 1990

William K. Reilly
Environmental Protection Agency
401 M. Street, SW
Washington, D.C. 20460

Dear Sir,

I understand that the Ethyl Corporation is seeking approval of a new gasoline additive called Hi Tec 3000. This additive contains manganese. Now we already had to suffer the consequences of an Ethyl additive containing lead. Why wait to hurt people and have to perform costly cleanups that never really get it all. Let's not put this additive into the environment at all. We know that larger doses of manganese can cause Parkinson's Disease symptoms. We do not know the effects of

-2-

prolonged exposure to small doses. We should be learning from our past mistakes.

Please do not approve this additive.

Do not take any credence from the Ethyl Corporations claims that it is safe. They claimed that the lead additive was safe too when their proof they knew it wasn't.

Our society is counting on you to protect us from potentially harmful substances. Thank you very much.

Sincerely,

Mrs. C. Osman
mother &

teacher of third
grade gifted
students

who follow these issues!

A-90-16

37A Spring Park Ave
Jamaica Plain, MA.
02130

Oct. 22, 1990

Dear Administrator Reilly,

As a public citizen deeply concerned
for the safety of our environment, especially
for our children and the elderly, I
strongly urge you to deny Ethyl Corpora-
tion's application for "Hi Tec 3000", a
toxic manganese-based gasoline
additive.

Sincerely,

Cynthia A. Foster

10/20/90

WILLIAM K. REILLY, ADMINISTRATOR,

RECENTLY I WAS INFORMED OF THE INTENT TO APPROVE OF MANGANESE ADDITIVES FOR GASOLINE. I AM AT A LOSS TO COMPREHEND THE NEED FOR SUCH ADDITIVES, ASIDE FOR PROVIDING FINANCIAL GAIN TO INDUSTRY AT CONSIDERABLE ENVIRONMENTAL DEGRADATION. THE UNKNOWN ASSOCIATED WITH LOW DOSE EXPOSURE TO A KNOWN TOXIC HEAVY METAL OFFER LITTLE ASSURANCES. THIS DOES NOT APPEAR TO BE A PRUDENT DIRECTION IN WHICH TO PROCEED, EVEN IF PURPORTED BENEFITS WERE CONFIRMED.

THE LITERATURE REGARDING LEAD AS AN ADDITIVE HAVE DEMONSTRATED THE ENVIRONMENTAL + HEALTH FOLLY OF PAST DECISIONS. INDUSTRY'S CONCERN FOR

SHORT TERM PROFIT HAVE GENERATED
LONG TERM HEALTH CONSEQUENCES
AT CONSIDERABLE COST TO SOCIETY.

THIS PROPOSAL APPEARS TO BE
ANOTHER BAD IDEA THAT MAKES LITTLE
SENSE FROM AN ENVIRONMENTAL, BUT
MORE IMPORTANTLY FROM AN
ECONOMIC POINT OF VIEW. I DON'T
WISH MY DESCENDANTS TO BEAR
THE FINANCIAL BURDEN OF SUCH
A DECISION.

SINCERELY.

GUS BRANSON
BOX 160
GREENWOOD LAKE, N.Y.
10925

A-90-16

Box 485
Easton, MD 21601
October 22, 1990

William K. Reilly
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly; Re: "HiTec 3000"

The EPA should never approve the request by the Ethyl Corporation to market a gasoline additive it calls "HiTec 3000" which contains manganese, a toxic heavy metal known to produce symptoms of "Parkinson's disease" at high levels.

Leaded gas, leaving residues of lead poisoning in dirt of yards - playgrounds our children use, has been eliminated. Surely, your agency will not permit another such hazard to ~~poison~~ ^{harm} our people in years to come. The Ethyl Corporation is involved in misleading attempts to make their new product appear safe. That is shameful and dangerous.

Sincerely,
Lorraine P. Claggett

A-90-16

28 South Spruce St.
Litchy, PA 17543
October 22, 1990

Dear Mr. Reilly:

I am concerned about the Ethyl Corporation's application to use MMT, an octane-enhancing gasoline additive. I understand that one of the byproducts is the toxic metal, manganese. Apparently, little is known about the long-term effects of manganese in the environment.

Little was known about the environmental impact of lead when it was similarly introduced into gasoline. It proved to be a serious error in terms of health and economic impact. We can avoid a similar disaster by refusing to allow increasing concentrations of manganese in our air, soil and water.

I urge you to deny Ethyl Corporation's application for HiTec 3000. We're having enough problems with air quality already.

Sincerely,
Mike Herr

A-90-16

17 Woodcreek Drive
Wimberley, Tx 78676
October 21, 1990

ADMINISTRATOR WK REILLY
EPA

WASHINGTON, DC 20460

Dear Mr. Reilly:

I write in appeal that you deny The Ethyl Corporation application to bring H. Tec 3000, a toxic manganese-based gasoline additive, to market.

This firm is already deeply and culpably in society's debt for foisting tailpipe lead on us for over half a century; we don't need another octane enhancer from them: This one might finish off what so regrettably the other started.

We are surely at a point now where everyone who wants to see can plainly see that the quality of life must take precedence over crass commercialisms of this ilk.

200C152 b1:40

Please send this request of theirs back to the drawing board.

RECEIVED

Yours very truly,
JC Esberg

A-90-16

22 Broadview Court

Portland, ME 04103

25 October, 1990

Mr. William K. Reilly

EPA

401 M Street, S.W.

Washington, D.C. 20460

Dear Mr. Reilly,

I'm appalled to learn that Ethyl Corp. of America wants to market a gasoline additive that contains manganese. Ethyl Corp sold lead additives & we know lead is a deadly poison. Manganese too, is toxic. I say NO!!!

Take a stand to protect all of us, particularly the children.

Sincerely,

Robert Southworth

1000130 05:55

A-90-16

10-24-90

DEAR MR. REILLY:

I IMPLORE YOU REJECT ETHYL CORPORATION'S REQUEST
FOR E.P.A. APPROVAL OF PETROLEUM ADDITIVE "HITEC 3000".

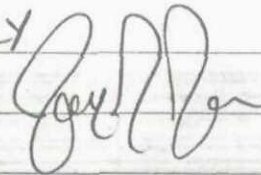
IT IS EVERMORE CERTAIN THAT WE MUST PUT
THE RIGHTS OF "THE PEOPLE", COLLECTIVELY, BEFORE THE
RIGHTS OF INDIVIDUALS AND CORPORATIONS TO MAKE
MONEY AT OUR EXPENSE. SADLY, THESE PARTIES WILL
NOT ACT RESPONSIBLY.

THANK YOU

JAY JONES

P.O. BOX 209
LAKEMONT, GA.

SINCERELY



30552

404 782 7625

A-90-16



ELIZABETH WHITTALL
2300 INDIAN CREEK BOULEVARD C121
VERO BEACH, FLORIDA 32966

October 1990

Dear Mr. Reilly,

I am writing to urge you
to reject Ethyl's application to
use MMT as an additive to
gasoline.

There is more than enough
pollution in our air today without
adding manganese.

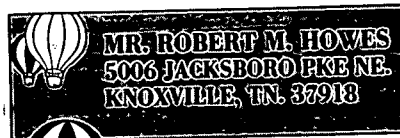
With all good wishes

Sincerely

Elizabeth Whittall

A-90-16

OCT 31 1990



Dear Mr. Kelly:-

Having lost a close friend
to Parkinson's Disease and a
wife to Alzheimer's I am sensitive
to the possible fatal impact of
heavy metal additives to the air
we breathe.

Please deny - at least
until further study - the application
of Ethyl Corporation for approval of
the HiTec 3000 - gasoline additive.

Thank you,

Robert M. Howes